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June 23, 2025

Via ECF

Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Giannakoulis v. Department of Education of the City of New York
25-cv-01670-CLP**

Dear Judge Donnelly:

This office represents the Plaintiff in the above-referenced matter. The Defendant filed a pre-motion letter to dismiss on June 23, 2025 (Dkt. No. 9), making Plaintiff's response due on June 30, 2025. I write to respectfully request an extension of time from **June 30, 2025, to July 9, 2025**, to file responsive papers to the Defendant's pre-motion Motion to Dismiss. The Defendant's counsel has graciously *consented* to this extension of time. This is Plaintiff's first request for an extension of time.

This request is made as Plaintiff's counsel has been engaged in multiple deadlines and appearances, which include, but are not limited to, opposition papers due in *Schulman v. The Department of Education for the City of New York*, Docket No. 24-cv-08322-AT, *Ragoonianan v. NYC DOE* and *Williams Cole vs. The Department of Education of the City of New York et al.*, 650365/202; a Second Circuit Brief in *Kim M. Brown v. The City University of New York*, Docket No. 25-694 due on July 7, 2025; a continuing hearing in *Anthony Tripo*.

I thank the Court for its consideration herein.

Respectfully submitted,

s/ Stewart Lee Karlin
Stewart Lee Karlin, Esq.
Attorney for Plaintiff

cc: Andrea Martin (via ECF)